



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

June 9, 2016

**BY ECF**

The Honorable William H. Pauley, III  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. James Capers et al.,  
15 Cr. 607 (WHP)**

Dear Judge Pauley:

In response to Andrew Patel's letter of June 2, 2016, the Government respectfully writes to provide the Court additional information regarding the Rule 16 discovery that has been produced in this case. The Government notes that while certain discovery productions have been large, they are all organized in named folders such that defense counsel can easily identify the nature of the materials produced. For example, discovery relating to acts of violence has been produced in folders named with the date and description of the act of violence. Facebook search warrant returns are identified as such and the name of the individual whose Facebook page was searched is either in the file title or the name of the folder. Such a naming convention assists defense counsel in identifying the types of documents that have been produced, reviewing the discovery, and determining whether there are any motions to be filed.

In addition, as Mr. Patel explained, the Government has offered to meet with counsel for each defendant to discuss the discovery relevant to that individual. When defense attorneys have contacted the Government regarding discovery, the Government has also identified categories of evidence that could potentially be the subject of a suppression motion. The Government will continue to assist defense counsel in reviewing the discovery.

The Government is prepared to proceed to trial on the scheduled date of November 28, 2016.

Respectfully submitted,

PREET BHARARA  
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cc: all counsel (by ECF)